

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CHRISTINE FINGER
Plaintiff

v.

UNITED AIRLINES, INC.
Defendant

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Civil Action No. 4:20-cv-04205

AGREED MOTION TO EXTEND DISCOVERY & OTHER DEADLINES

Plaintiff Christine Finger and Defendant United Airlines, Inc. (collectively, the “Parties”) file this Joint Motion to Extend Discovery, and for cause thereof would show as follows:

1. This matter is currently governed by this Court’s October 11th Amended Scheduling Order. [Dkt. 49.]
2. The Parties jointly conferred on the matter via email from December 4th, 2023 to December 15th, 2023.
3. The current discovery deadline is January 8th, 2024. The current dispositive motion deadline is February 9th, 2024.
4. The parties mutually agree that additional time is required for the meaningful completion of discovery in this matter. The Plaintiff seeks additional time to take the deposition of no less than seven (7) individuals; four (4) of which are representatives / employees of the Defendant, and three (3) of which are representatives of non-party Association of Flight Attendants.
5. Additionally, Plaintiff contends there remain unresolved discovery deficiencies which require the parties’ conferences and cooperation while the parties await the Court’s determination on the Defendant’s motion to substitute counsel. [Dkt. 50]

6. The Parties believe additional time is necessary to meaningfully complete discovery and engage in dispositive motion practice.
7. Accordingly, the Parties respectfully request that the Court continue the ***current discovery and dispositive motion deadlines by sixty (60) days***.
8. The Parties do ***not*** seek extension on the Court's determination regarding the dates allotted for Joint Pretrial Order, Final Pretrial Conference, or Jury Selection and Trial.

In accordance, the parties respectfully request the Court's assistance in the provision of a new Scheduling Order reflecting the above proposed 60 day extension.
9. This request for continuance on discovery and dispositive motion practice is not sought for the purpose of delay, but so that justice may be done.

Respectfully submitted,

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CERTIFICATE OF SERVICE

It Is hereby certified that on December 15th, 2023, the undersigned counsel electronically filed the foregoing, in the above styled and numbered cause of action, and copies same filing to the electronic mail service of the following:

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